

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

V.

JOSHUA MAST, *et al.*,

Defendants,

Case No. 3:22-cv-49-NKM

**DEFENDANTS JOSHUA AND STEPHANIE MAST’S MOTION TO SEAL THEIR
REPLY IN SUPPORT OF THEIR MOTION TO COMPEL AND THEIR
DEFICIENCY LETTER ATTACHED TO THE MOTION TO COMPEL**

Defendants Joshua and Stephanie Mast (the “Masts”), by and through their undersigned counsel, hereby move the Court to seal their Reply in Support of their Motion to Compel (ECF No. 317) and the deficiency letter attached as an exhibit to their motion to compel (ECF No. 300-7) because those documents contain inadvertent disclosures, and the Masts believe sealing is the best way to comply with the Court’s protective order (ECF No. 26).¹ The Masts are simultaneously filing a corrected copy of their Reply in Support of their Motion to Compel.

Dated: November 28, 2023

Respectfully submitted,

/s/ Michael Francisco

John S. Moran (VSB No. 84326)
Michael L. Francisco (*pro hac vice*)
MCGUIREWOODS LLP
888 16th St. N.W., Suite 500
Black Lives Matter Plaza
Washington, DC 20006
T: (202) 828-2817

¹ The Masts maintain, however, that this protective order should be modified or lifted because it does not comply with the First Amendment. *See* ECF No. 130.

F: (202) 828-3327
jmoran@mcguirewoods.com
mfrancisco@mcguirewoods.com